

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: VICKIE DONALD KILPATRICK

CASE NO. 16-00705-NPO
CHAPTER 13

MOTION TO APPROVE SELL OF PROPERTY

COMES NOW Debtor, Vickie Donald Kilpatrick, and files this her Motion to Approve
Sell of Property and in support thereof would show unto the Court the following:

1.

The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334, 28 U.S.C. §157,
11 U.S.C. § 363 and Rule 6004 of the Federal Rules of Bankruptcy Procedure.

2.

On, March 2, 2016, Vickie Donald Kilpatrick, (hereinafter referred to as “Debtor”) filed
a petition for relief under Chapter 13 of the United States Bankruptcy Code.

3.

At the time of the filing of the Chapter 13 petition, the Debtor owned a 1999 Nissan
Frontier and listed said vehicle as property of the estate, with First Franklin as the lien holder.

4.

The vehicle was involved in an accident and sustained significant damage. As a result,
Debtor wishes to sell the vehicle because she is without funds to properly fix the vehicle.

5

Debtor has received an offer for the purchase of the vehicle in the amount of \$3,000.00.

6.

Debtor requests that this Court approve the sell of the vehicle so that First Franklin's lien can be satisfied.

7.

Debtor requests that any excess funds, after satisfaction of the lien holder, be released to the Debtor to secure the purchase of another vehicle.

WHEREFORE, PREMISES CONSIDERED, Debtor requests that this Court enter an order granting the above requested relief and any additional general or specific relief to which she may be entitled.

RESPECTFULLY SUBMITTED,

/s/Tyvester O. Goss

TYLVESTER O. GOSS

ATTORNEY FOR DEBTOR

GOSS & WILLIAMS, PLLC
P.O. BOX 2957
MERIDIAN, MS 39202
(601) 485-6355
MS BAR NO. 4920

CERTIFICATE OF SERVICE

I, Tylvester O. Goss, do hereby certify that I have this date served, via Electronic Mail and United States Mail, postage prepaid, a true and correct copy of the above and foregoing Notice of Motion to Approve Sell of Property to the following:

AFFECTED CREDITORS: All creditors on mailing matrix list

CASE TRUSTEE: J.C. Bell, Mdg@jcbell.net

US. TRUSTEE: USTPRegion05.JA.ECF@usdoj.gov

This the 28th day of June, 2017.

/s/Tylvester O. Goss

TYLVESTER O. GOSS

ATTORNEY FOR DEBTORS